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Attorneys for Plaintiff
Michael Stokes

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

MICHAEL STOKES,

Plaintiff,

vs.

MENAGERIE, INC.,

Defendant.

Case No. 5:22-cv-01103-SSS-KK

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
DEFAULT JUDGMENT
PURSUANT TO FED. R. CIV. PRO.
55(b)(2)**

Judge: Hon. Sunshine S. Sykes

Date: December 2, 2022

Time: 2:00 p.m.

Location: 3470 Twelfth Street
Riverside, California
92501-3801

Courtroom 2, 2nd Floor

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 2:00 p.m. on December 2, 2022, or as soon thereafter as the matter may be heard, before the Honorable Sunshine S. Sykes, of the United States District Court for the Central District of California, Eastern Division, in Courtroom 2, 3470 Twelfth Street, Riverside,

1 California 92501-3801, Plaintiff Michael Stokes (“Plaintiff”) will and hereby does
2 move this Court for a default judgment against Defendant, Menagerie, Inc. Said
3 motion will be made upon the grounds set forth in the accompanying memorandum
4 in Support of Plaintiff’s Motion for a default judgment, the Declaration of Craig B.
5 Sanders dated October 31, 2022, the Affidavit of Michael Stokes dated October 31,
6 2022, and the complete files and records of this action.
7

8
9 **CONFERENCE OF COUNSEL**

10 There has been no conference of counsel prior to making this motion, insofar
11 as Defendant failed to timely appear, the Clerk entered a notation of Default against
12 Defendant, and the Court subsequently directed Plaintiff to file the instant motion.
13 In other words, there is no adverse party recognized by the Court with whom a
14 conference could have taken place.
15
16

17 Dated: October 31, 2022
18

19 **SANDERS LAW GROUP**

20 By: /s Craig B. Sanders
21 Craig B. Sanders, Esq. (Cal bar 284397)
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23 Uniondale, NY 11553
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CERTIFICATE OF SERVICE

Case Name: Stokes v. Menagerie, Inc.

Case No.: 5:22-cv-01103-SSS-KK

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, declare under penalty of perjury that I am a citizen of the United States, and am over 18 years of age. My business address is 333 Earle Ovington Blvd. Suite 402, Uniondale, NY 11553. I am not a party to this action.

I have caused service of the following documents, described as:

PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR DEFAULT JUDGMENT

On the following parties by email on October 31, 2022 at:

Menagerie, Inc.
3581 University Ave
Riverside, CA 92501

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: October 31, 2022

/s Craig B. Sanders
Craig B. Sanders